U.S. Department of Justice



United States Attorney Southern District of New York

The Jacob K. Javits Federal Building 26 Federal Plaza, 37th Floor New York, New York 10278

BY ECF

The Honorable John P. Cronan United States District Judge Southern District of New York 500 Pearl St. New York, NY 10007

Re: United States v. Ross Lanvin, 25 Cr. 106 (JPC)

Dear Judge Cronan:

The Government writes to respectfully request that the Court adjourn the June 18, 2025 status conference in this matter for approximately 45 days. The Government understands that the parties and the Court are available on August 4, 2025 at 11:00 a.m. Defense counsel consents to this request.

Since the parties' last appearance on March 17, 2025, the Government has produced discovery pursuant to Rule 16 of the Federal Rules of Criminal Procedure and has made the devices seized from the defendant and certain warrant returns containing child sexual abuse material available for defense counsel to review. The Government also has completed a substantial portion of its responsiveness review and is working to produce to defense counsel redacted versions of these materials, although it has faced delays both due to the amount of material and technical issues in extracting it in a redacted manner. The 45-day adjournment will allow the Government time to provide counsel with this data and to continue its full responsiveness review, and will also allow the defense time to review these materials.

The Government also respectfully requests that the time between today and the next conference be excluded pursuant to the provisions of the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A). The Government respectfully submits that the ends of justice served by granting the proposed exclusion outweigh the best interests of the public and the defendant in a speedy trial, as the proposed exclusion will allow the Government time to produce additional discovery, the defendant time to review discovery, and the parties an opportunity to discuss the possibility of a pretrial resolution of this case. Defense counsel consents to this request.

June 13, 2025

Respectfully submitted,

JAY CLAYTON United States Attorney Southern District of New York

By: Jawan Pullipe

Lauren E. Phillips Assistant United States Attorney (212) 637-2231

cc: Marne Lenox, Esq. (by ECF)

The request is granted. The conference originally scheduled for June 18 is adjourned to August 4, at 11:00 a.m., in Courtroom 12D of 500 Pearl Street, New York, NY 10007. Time excluded under the Speedy Trial Act from June 18, 2025 until August 4, 2025 pursuant to 18 U.S.C. 3161(h)(7), to allow the Government time to produce additional discovery, the defendant time to review discovery, and the parties an opportunity to discuss the possibility of a pretrial resolution of this case.

SO ORDERED June 16, 2025 New York, New York

JOHN P. CRONAN United States District Judge